

SUNG-MIN LEE (#025562008)

BARBARA J. HART (*pro hac vice* application forthcoming)

DAVID C. HARRISON (*pro hac vice* application forthcoming)

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Counsel for Movant Amalgamated Bank

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

TIMOTHY M. FORDEN, Individually
And On Behalf Of All Others Similarly
Situated,

Plaintiff,

v.

ALLERGAN PLC, BRENTON L.
SAUNDERS, PAUL M. BISARO,
MARIA TERESA HILADO, and R.
TODD JOYCE,

Defendants.

Case No: 2:16-cv-09449-SDW-LDW

CLASS ACTION

MOVANT AMALGAMATED
BANK'S RESPONSE IN SUPPORT
OF MOTION BY SJUNDE AP-
FONDEN AND UNION ASSET
MANAGEMENT HOLDING AG
FOR APPOINTMENT OF LEAD
PLAINTIFF; CONSOLIDATION
OF RELATED ACTIONS; AND
APPROVAL OF SELECTION OF
COUNSEL

Motion Day: February 6, 2017

Judge: Hon. Susan Davis Wigenton

Caption continued on next page

LINA ARSLANIAN, Individually And On
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

ALLERGAN PLC, ACTAVIS PLC,
PAUL M. BISARO, ROBERT TODD
JOYCE, BRENTON L. SAUNDERS, and
MARIA TERESA HILADO,

Defendants.

Case No: 2:17-cv-00002-SDW-LDW

CLASS ACTION

Motion Day: February 6, 2017

In response to the Motion for Lead Plaintiff filed by Sjunde AP-Fonden (“AP7”) and Union Asset Management Holding AG (“Union”) (Dkt. No. 10), Movant Amalgamated Bank, as Trustee for the LongView Collective Investment Fund (“Amalgamated Bank”) acknowledges that AP7 and Union have the largest reported loss of all movants and otherwise satisfy the requirements of Rule 23 of the Federal Rules of Civil Procedure. 15 U.S.C. § 78u-4(a)(3)(B)(i), (iii). Also, AP7 and Union have selected the qualified firms of Kessler Topaz Meltzer & Check, LLP and Motley Rice LLP as Lead Counsel for the class, and Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C. as Liaison Counsel for the class. *See* 15 U.S.C. § 78u-4(a)(3)(B)(v). Accordingly, Amalgamated Bank supports the appointment of AP7 and Union as Lead Plaintiff and its selection of Lead Counsel.

DATED: January 23, 2017

Respectfully Submitted,

**LOWEY DANNENBERG COHEN
& HART, P.C.**

/s/ Sung-Min Lee

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CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2017, I caused a copy of the foregoing document to be filed electronically with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all ECF filers in the above-captioned matter.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 23, 2017.

/s/ Sung-Min Lee
SUNG-MIN LEE

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